

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

FILED IN OPEN COURT  
ON 9-25-19 PG  
Peter A. Moore, Jr., Clerk  
US District Court  
Eastern District of NC

NO. 7:19-cr-153-D(3)

UNITED STATES OF AMERICA )  
                                )  
                                )  
v.                            )                           INDICTMENT  
                                )  
                                )  
CRYSTAL DENISE JAMES )  
a/k/a "Red"               )

The Grand Jury charges that:

COUNT ONE

Beginning in or about August 2018, and continuing up to and including on or about June 6, 2019; in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute one hundred (100) grams or more of heroin, a Schedule I controlled substance; a quantity of fentanyl, a Schedule II controlled substance and a quantity of cocaine base (crack), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about August 13, 2018, in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and fentanyl, a Schedule II controlled substance and a quantity of cocaine base (crack), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

On or about April 25, 2019, in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about May 15, 2019, in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

On or about June 6, 2019, in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," did knowingly and

intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

On or about June 6, 2019 at a time separate and apart from that alleged in Count Five of this Indictment, in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," did knowingly and intentionally possess with the intent to distribute one hundred (100) grams or more of heroin, a Schedule I controlled substance; a quantity of fentanyl, a Schedule II controlled substance and a quantity of cocaine base (crack), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

On or about June 6, 2019, in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," knowing she had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm, and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT EIGHT

On or about June 6, 2019, in the Eastern District of North Carolina, the defendant, CRYSTAL DENISE JAMES, also known as "Red," did knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which

she may be prosecuted in a court of the United States as set forth in Count Six of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

[Remainder of page intentionally left blank]

**FORFEITURE NOTICE**

The defendant is given notice of the provisions of Title 21, United States Code, Section 853, and Title 18, United States Code, Sections 924(d)(1), as made applicable to these proceedings by virtue of Title 28, United States Code, Section 2461(c), that all of their interest in all property specified herein is subject to forfeiture including but not limited to the Defendants' interest in the firearms specified herein are subject to forfeiture.

Upon conviction of the offenses set forth in Counts One through Six, the defendant shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of the said offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged, or any property traceable to such property.

Upon conviction of the foregoing offenses in the Counts Seven and Eight of the Indictment, the Defendant shall forfeit to the United States all firearms and ammunition involved and used in the knowing violation of the offenses.

The forfeitable property includes, but is not limited to, the following:

- (a) The gross proceeds personally obtained by the defendant(s), in an amount of at least \$1,200.00;
- (b) \$8,854.00 United States Currency; and
- (c) Mossberg .22 caliber model 715T.

If any of the above-described forfeitable property, as a result of any act or omission the defendant,

(1) cannot be located upon the exercise of due diligence;  
(2) has been transferred or sold to, or deposited with, a third person;  
(3) has been placed beyond the jurisdiction of the court;  
(4) has been substantially diminished in value; or  
(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 9/24/19

ROBERT J. HIGDON, Jr.  
United States Attorney

BY: F. MURPHY AVERITT III  
Special Assistant United States Attorney